

EXHIBIT A

Exhibit A – Index of Materials to be Sealed**General Motors, LLC's Motion to Seal Exhibits re Plaintiffs' Motion for Class Certification****Materials designated with * are unopposed all other redactions are opposed.**

Exhibit	Description of Confidential Materials	Designated Confidential	Designating Party
Brief in Support of Motion for Class Certification	<p>p.2-4; 5; 11; 20; 23 (portions of)</p> <p>Discussion of GM internal investigation and analysis, processes, warranty framework, warranty costs taken from portions of documents previously under seal or addressed in this index.</p>	Yes	GM
01	<p>Lange Rpt. at Page 51, 96-106, 113-121, 170-181; Paragraphs 59, 107-110, 119, 151: Reproduction and discussion of confidential GM reports concerning proprietary defect and field investigation processes.</p> <p>Lange Rpt. at Page 87*; Paragraph 103: Discussion of confidential GM document concerning proprietary benchmarking process during vehicle development.</p> <p>Lange Rpt. at Pages 94-95*, 193-94; Paragraphs 106, 170: Confidential GM internal document concerning proprietary future model year design, features, and engineering.</p>	Yes	GM

Exhibit A – Index of Materials to be Sealed**General Motors, LLC's Motion to Seal Exhibits re Plaintiffs' Motion for Class Certification****Materials designated with * are unopposed all other redactions are opposed.**

Exhibit	Description of Confidential Materials	Designated Confidential	Designating Party
02	PX182* GM000402629 Confidential GM document concerning internal GM deliberations and analysis regarding proprietary field action process and analysis, as well as internal safety, customer satisfaction, and legal claims investigation process and system for analysis.	Yes	GM
03	Tim Keenan Deposition Tr.* 285:12-21; 290:22-24; 291:1-5 Discussion of internal GM deliberations and analysis regarding proprietary field action process and analysis, engineering and design decisions.	Yes	GM
07	PX570 GM000056275; GM000056284; GM000056287; GM000056290-92; GM000056294-96; GM000056301; GM000056304; GM000056309-11; GM000056319* Confidential GM document containing: engineering analysis concerning non-8L transmissions:	Yes	GM

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Exhibit	Description of Confidential Materials	Designated Confidential	Designating Party
	GM000056320 Internal engineering analysis regarding warranty cost.		
09	Joseph James Page Dep Tr.* 98:14-15; 21-23; 99:9-24 Discussion of proprietary confidential information regarding future model year vehicle design and engineering and confidential internal analysis and investigation process	Yes	GM
11	PX 122 GM000874536-38; GM000874540-42; GM000874546-64 Confidential GM document discussing GM’s internal warranty analysis, targets, and costs; product improvement and strategy.	Yes	GM

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Exhibit	Description of Confidential Materials	Designated Confidential	Designating Party
13	Eric Bloink Deposition Tr.* 44:21, 45:17-18; 77:15, 24 Reference to competitively sensitive non-public GM warranty costs and potential cost recovery	Yes	GM
14	PX 190 GM000875263-65* Confidential GM internal email conversation concerning proprietary warranty and cost recovery processes and analyses.	Yes	GM
21	PX70 Information re negotiations with other OEMs and confidential internal discussions re field analysis and internal investigations.	Yes	GM
23	PX230 AFTON_0015096 Redacted as third-party/non-party confidential information regarding third-party product.	Yes	Afton Chemical

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Exhibit	Description of Confidential Materials	Designated Confidential	Designating Party
24	PX231 AFTON_0011800-01-03 (portions of) Redacted as third-party/non-party confidential information regarding third-party product. Marked confidential by AFTON.	Yes	Afton Chemical
32	PX234 AFTON_0000818 (portion of) Redacted as third-party/non-party confidential information regarding third-party product. Marked confidential by AFTON.	Yes	Afton Chemical
33	PX237 AFTON_0016462 (portion of) Redacted as third-party/non-party confidential information regarding third-party product. Marked confidential by AFTON.	Yes	Afton Chemical
35	PX179* GM000504048-49 Confidential GM document concerning warranty cost analysis.	Yes	GM

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Exhibit	Description of Confidential Materials	Designated Confidential	Designating Party
36	PX108* GM000560881 Discussion containing confidential proprietary warranty cost information	Yes	GM
42	8 Speed RWD VPE Quality Update Powerpoint Presentation* GM000043488, GM000043490, GM000043491, GM000043492, GM000043494, GM000043495-99, GM000043506-09, GM000043511, GM000043513, GM000043515-17) Confidential GM document concerning internal GM deliberations and analysis regarding proprietary field action process and analysis.	Yes	GM
44	PX212 GM000067241-46 (portions of) Discussion of proprietary confidential information regarding confidential internal analysis and investigation process, including discussion re other GM products.	Yes	GM